



UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TAE MIYAJI JONES,

Defendant.

No. 8:25-cr-00140-FWS

I N F O R M A T I O N

[18 U.S.C. § 1341: Mail Fraud;  
18 U.S.C. § 1343: Wire Fraud;  
18 U.S.C. § 981(a)(1)(C) & 28  
U.S.C. § 2461(c): Criminal  
Forfeiture]

The United States Attorney charges:

INTRODUCTORY ALLEGATIONS

At times relevant to this Information:

1. Defendant TAE MIYAJI JONES ("JONES") resided in Orange County, within the Central District of California.

2. From at least as early as 2010 through her termination on October 20, 2023, defendant JONES was the Account Manager for a California based noodle corporation, S.F.

3. S.F. manufactured a variety of instant noodle products, which were distributed throughout the United States and Canada. S.F. was headquartered in Garden Grove, California, within the Central District of California.

1           4.     S.F. conducted business with several vendors to facilitate  
2 its business needs.

3           5.     S.F. had a bank account ending in 0496 at Union Bank  
4 ("Union Bank Account -0496"), which it used for transactions with its  
5 various vendors.

6           6.     Defendant JONES had a personal banking account with  
7 American Express ("AMEX") ending in -91001.

8           7.     Defendant JONES had personal banking accounts with Boeing  
9 Employees' Credit Union ("BECU") ending in -6072, -0262, -6064,  
10 -4417, -6606, -5447, -1265, -6614, -7771, and -8600.

11           8.     Defendant JONES had a personal banking account with First  
12 National Bank of Omaha ("FNBO") ending in -2962.

13           9.     As S.F.'s Account Manager, defendant JONES's  
14 responsibilities included administering S.F.'s accounting and  
15 financial operations, including but not limited to, budgeting for  
16 salaries, business expenses, regulatory and tax compliance;  
17 accounting; managing and implementing internal financial controls;  
18 managing relationships with external vendors; handling procurement of  
19 manufacturing goods from such vendors; and identifying new business  
20 opportunities for S.F. Defendant JONES had access to and control of  
21 the S.F.'s financial systems, corporate accounts, and records.  
22 Defendant JONES also had check signing authority in her role as  
23 Account Manager.

24           10.    Defendant JONES was prohibited by S.F. from using her  
25 access to S.F.'s accounting systems to conduct any personal  
26 transactions.

COUNTS ONE THROUGH SEVEN

[18 U.S.C. § 1341]

11. Paragraphs 1 through 10 of the Introductory Allegations of this Information are realleged and incorporated as though fully set forth herein.

A. THE SCHEME TO DEFRAUD

12. Beginning on a date unknown, but no later than December 31, 2017, and continuing through at least July 21, 2023, in Los Angeles and Orange Counties, within the Central District of California, and elsewhere, defendant TAE MIYAJI JONES, knowingly and with intent to defraud, devised and executed a scheme to obtain monies and other property owned by and in the custody and control of S.F., by means of material false and fraudulent pretenses, representations, and promises, and the concealment of material facts.

13. The fraudulent scheme operated and was carried out, in substance, as follows:

a. Without the knowledge, consent, or approval of S.F., and in violation of S.F. policies and procedures, defendant JONES would transfer and cause to be transferred S.F. funds from Union Bank Account -0496 to personal accounts in her own name to finance personal expenses including, among other things, home mortgages, jewelry, car loans, and charges she incurred on her personal credit cards.

b. Defendant JONES would falsify and cause to be falsified S.F.'s account records in order to conceal her unauthorized takings, which were material matters.

14. As a result of the scheme described above, defendant JONES fraudulently obtained approximately \$2,894,441 from S.F.

B. EXECUTION OF THE FRAUDULENT SCHEME

15. On or about the dates set forth below, within the Central District of California, defendant JONES, for the purpose of executing and attempting to execute the above-described scheme to defraud, willfully caused the following items to be placed in an authorized depository for mail matter to be sent and delivered by the United States Postal Service, according to the direction thereon:

COUNT	DATE	ITEM MAILED
ONE	July 6, 2023	Check for \$42,600 from S.F.'s Union Bank Account -0496 to AMEX, P.O. Box 96001, Los Angeles, CA 90096 to be applied to defendant JONES's credit card balance on the account ending in -91001.
TWO	December 6, 2022	Check for \$58,800 from S.F.'s Union Bank Account -0496 to AMEX, P.O. Box 96001, Los Angeles, CA 90096 to be applied to defendant JONES's credit card balance on the account ending in -91001.
THREE	July 6, 2022	Check for \$42,300 from S.F.'s Union Bank Account -0496 to AMEX, P.O. Box, 96001, Los Angeles, CA 90096 to be applied to defendant JONES's credit card balance on the account ending in -91001.
FOUR	June 3, 2022	Check for \$46,800 from S.F.'s Union Bank Account -0496 to AMEX, P.O. Box, 96001, Los Angeles, CA 90096 to be applied to defendant JONES's credit card balance on the account ending in -91001.
FIVE	September 8, 2021	Check for \$16,800 from S.F.'s Union Bank Account -0496 to FNBO, P.O. Box 2557, Omaha, NE 68103 to be applied to defendant JONES's credit card balance on the account ending in -2962.
SIX	December 11, 2020	Check for \$29,650 from S.F.'s Union Bank Account -0496 to FNBO, P.O. Box 2557, Omaha, NE 68103 to be applied to defendant JONES's credit card balance on the account ending in -2962.

COUNT	DATE	ITEM MAILED
SEVEN	December 10, 2019	Check for \$48,600 from S.F.'s Union Bank Account -0496 to FNBO, P.O. Box 2556, Omaha, NE 68103 to be applied to defendant JONES's credit card balance on the account ending in -2962.

COUNTS EIGHT THROUGH TEN

[18 U.S.C. § 1343]

16. Paragraphs 1 through 10 of the Introductory Allegations of this Information are realleged and incorporated as though fully set forth herein.

A. THE SCHEME TO DEFRAUD

17. Beginning on a date unknown, but no later than on or about December 31, 2017, and continuing through at least on or about July 21, 2023, in Los Angeles and Orange Counties, within the Central District of California, and elsewhere, defendant TAE MIYAJI JONES, knowingly and with intent to defraud, devised and executed a scheme to obtain monies and other property owned by and in the custody and control of S.F., by means of material false and fraudulent pretenses, representations, and promises, and the concealment of material facts.

18. The fraudulent scheme operated and was carried out, in substance, as follows:

a. Without the knowledge, consent, or approval of S.F., and in violation of S.F. policies and procedures, defendant JONES would transfer and cause to be transferred S.F. funds from Union Bank Account -0496 to personal accounts in her own name to finance, personal expenses, including among other things, home mortgages, jewelry, car loans, and charges she incurred on her personal credit cards.

b. Defendant JONES would falsify and cause to be falsified S.F.'s account records in order to conceal her unauthorized takings, which were material matters.

19. As a result of the scheme described above, defendant JONES fraudulently obtained approximately \$2,894,441 from S.F.

1 B. USE OF THE WIRES

2 20. On or about the dates set forth below, within the Central  
3 District of California, and elsewhere, defendant JONES, for the  
4 purpose of executing the above-described scheme to defraud, caused  
5 the transmission of the following items by means of wire  
6 communications in interstate commerce:

COUNT	DATE	ITEM WIRED
EIGHT	July 29, 2021	Electronic transfer of \$259,000 of S.F. funds from defendant JONES's BECU bank account ending in -6072 to Nationstar Mortgage, LLC.
NINE	August 2, 2019	Mobile check deposit for \$13,480 from S.F.'s Bank Account ending in -0496 to a BECU bank account which defendant JONES controlled.
TEN	November 20, 2018	Mobile check deposit for \$18,950 from S.F.'s Bank Account ending in -0496 to a BECU bank account which defendant JONES controlled.

FORFEITURE ALLEGATION

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of the defendant's conviction of the offenses set forth in any of Counts One through Ten of this Information.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to the offenses, including but not limited to:

(i) The real property located at 125 Innocent Trail, Madison, Alabama, 35756, more particularly described at Assessor's Parcel Number 1701020002072000; and

(ii) The real property located at 69-555 Waikoloa Beach Drive, Unit 2804, Waikoloa, Hawai'i, 96738, more particularly described at Assessor's Parcel Number 3-6-9-007-035-0166; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), the defendant, if so convicted, shall forfeit substitute property, up to



1 the total value of the property described in the preceding paragraph  
2 if, as the result of any act or omission of said defendant, the  
3 property described in the preceding paragraph, or any portion  
4 thereof: (a) cannot be located upon the exercise of due diligence;  
5 (b) has been transferred, sold to or deposited with a third party;  
6 (c) has been placed beyond the jurisdiction of the court; (d) has  
7 been substantially diminished in value; or (e) has been commingled  
8 with other property that cannot be divided without difficulty.

9  
10 BILAL A. ESSAYLI  
11 United States Attorney

12 CHRISTINA T. SHAY  
13 Assistant United States Attorney  
14 Chief, Criminal Division

15 

16 FRANCES S. LEWIS  
17 Assistant United States Attorney  
18 Chief, General Crimes Section

19 SHAWN T. ANDREWS  
20 Assistant United States Attorney  
21 Deputy Chief, General Crimes  
22 Section

23 ANDREW M. ROACH  
24 Assistant United States Attorney  
25 Deputy Chief, General Crimes  
26 Section

27 CLIFFORD D. MPARE  
28 Assistant United States Attorney  
General Crimes Section